

The Honorable Ronald B. Leighton

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WESTERN WASHINGTON
AT TACOMA**

CALLI L. HISEY, an individual; and **CALLI
HISEY LAW OFFICES PC**, a Washington
corporation,

Plaintiffs,

v.

KELLY ELLIS, an individual; **INNOVATIVE
DATA SEARCH LLC d/b/a
www.BankruptReport.com**, a Delaware company,
ENOM, LLC, a Washington corporation;
**PRIVACY PROTECTION SERVICE INC.
d/b/a PrivacyProtect.org**; **GOOGLE INC.**, a
Delaware corporation; **YAHOO! INC.**, a Delaware
corporation; **MICROSOFT CORPORATION**, a
Washington corporation; and **JANE DOES** and
JOHN DOES 1-10, inclusive,

Defendants.

Case No. 3:17-cv-05543-RBL

**DEFENDANTS' UNOPPOSED
MOTION TO SEAL RECORDS**

**NOTE ON MOTION CALENDAR:
11/3/2017**

LCR 5(g) CERTIFICATION

Defendants met and conferred with Plaintiffs in an attempt to reach an agreement on
the need to file the documents described below under seal on October 18, 2017 by sending the

1 draft Declaration and sealed exhibits in an email to Plaintiff Calli L. Hisey. Plaintiffs do not
2 oppose Defendants' filing of this Motion.

3 **MOTION**

4 COMES NOW, Defendants Kelly Ellis and Innovative Data Search LLC
5 ("Defendants"), and move the Court pursuant to LCR 5(g) for an Order to seal records.

6 Defendants seek to file records containing information to be attached as exhibits to the
7 Declaration of Susan Ford ("Ford Declaration") in Support of Defendants' Surreply
8 Memorandum in Opposition to Plaintiffs' Special Motion to Strike and Motion to Dismiss.

9 Defendants make this motion in an attempt to avoid further motions practice or
10 requests for sanctions regarding the content of the records. However, in asking this Court to
11 seal these records, Defendants do not concede that publicly available records should be sealed
12 from public view, nor do Defendants waive any claims or defenses hereby. In fact, Defendants
13 request that, pursuant to Federal Rule of Evidence 201, this Court take judicial notice of these
14 records and provide the necessary information for the Court to do so in the exhibits to the Ford
15 Declaration.

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1 For the reasons set forth herein, Defendants respectfully request that the Court enter an
2 Order to seal the records of Plaintiff Calli L. Hisey filed herewith.

3 DATED this 20th day of October 2017.

4 Respectfully submitted,

5 RES NOVA LAW

6 By: *s/ Susan Ford*

7 **Susan Ford, WSBA No. 28015**

8 Res Nova Law

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14 Attorney for Defendants Kelly Ellis and
15 Innovative Data Search LLC
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ATTORNEY CERTIFICATE OF SERVICE

I hereby certify that on October 20 2017, I electronically filed the foregoing
DEFENDANTS' UNOPPOSED MOTION TO SEAL RECORDS with the Clerk of the Court
using the CM-ECF system sending notification of such filing to the attorneys of record who
are registered as such on the CM-ECF system.

DATED this 20th day of October 2017.

Respectfully submitted,

RES NOVA LAW

By: *s/ Susan Ford*

Susan Ford, WSBA No. 28015

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